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: ANNUAL RESPONDENT BURDEN & COST OF MONITORING/RECORD KEEPING/REPORTING

occurrence Respondents respondent Respondents hours Cost $$$ (A) (B) (C)=(AxB) (D) (E)=(CxD) (H) a		Person-	Occurrences	Person-		Total	
Applications	Burden Item	hours per	per	hours per		person-	
1. Applications		occurrence	Respondents	respondent	Respondents	hours	Cost\$
2. Surveys and Studies		(A)	(B)	(C)=(AxB)	(D)	(E)=(CxD)	(H) ^a
3. Reporting Requirements A. Read Instructions B. Required Activities - Submit Design Plan - Initial performance test report - Annual Compliance Report - Quarterly surface methane monitoring - Quarterly surface me	1. Applications	N/A					
A. Read Instructions	2. Surveys and Studies	N/A					
B. Required Activities - Submit Design Plan - Initial performance test report - Quarterly surface methane monitoring b	3. Reporting Requirements						
- Submit Design Plan	A. Read Instructions	N/A					
- Initial performance test report	B. Required Activities						
- Annual Compliance Report - Quarterly surface methane monitoring b 14 4 56 173 9,688 547,081.36 - OMM of portable monitor c C. Create Information See 3B D. Gather Existing Information See 3B E. Write Report - Initial design capacity report - Annual report of NMCC flow rate N/A (Tier 1 calculation) Report of Tier 2 and 3 Sampling Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordseping Requirements A. Read Instructions See 3A B. Plan Activities N/A D. Develop Record System E. Time to Enter Information - Records of control system monitoring b Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Submit Design Plan	N/A					
- Quarterly surface methane monitoring b 14 4 56 173 9,688 547,081.36 - O&M of portable monitor c C. Create Information See 3B D. Gather Existing Information See 3B E. Write Report - Initial design capacity report N/A - Annual report of NMOC flow rate N/A (Tier 1 calculation) N/A - Report of Tier 2 and 3 Sampling N/A - Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b 0.5 12 6 173 260 14,653.97 - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Initial performance test report	N/A					
- O&M of portable monitor c C. Create Information See 3B D. Gather Existing Information See 3E E. Write Report - Initial design capacity report N/A - Annual report of NMOC flow rate N/A (Tier 1 calculation) N/A - Report of Tier 2 and 3 Sampling N/A - Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b 0.5 12 6 173 260 14,653.97 - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Annual Compliance Report	2	1	2	173	346	19,538.62
C. Create Information D. Gather Existing Information E. Write Report Initial design capacity report N/A Annual report of NMOC flow rate N/A (Tier 1 calculation) Report of Tier 2 and 3 Sampling Report of initial performance test See 3B See 3B Semi-annual compliance report See 3B Recordkeeping Requirements A. Read Instructions B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information Records of control system monitoring b O.5 12 6 173 260 14,653.97 Records of accumulated refuse R/A F. Time to train Personnel G. Time for Audits N/A	- Quarterly surface methane monitoring $^{\rm b}$	14	4	56	173	9,688	547,081.36
D. Gather Existing Information E. Write Report Initial design capacity report Annual report of NMOC flow rate (Tier 1 calculation) Report of Tier 2 and 3 Sampling Report of initial performance test See 3B Semi-annual compliance report A. Read Instructions B. Plan Activities N/A C. Implement Activities N/A E. Time to Enter Information Records of control system monitoring b O.5 12 6 173 260 14,653.97 Records of cacumulated refuse F. Time to train Personnel G. Time for Audits N/A	- $O\&M$ of portable monitor c						
E. Write Report - Initial design capacity report - Annual report of NMOC flow rate (Tier 1 calculation) - Report of Tier 2 and 3 Sampling - Report of Tier 2 and 3 Sampling - Report of initial performance test - See 3B - Semi-annual compliance report - See 3B 4. Recordseping Requirements A. Read Instructions - See 3A B. Plan Activities - N/A D. Develop Record System - Time to Enter Information - Records of control system monitoring b - Records of accumulated refuse - Records of accumulated refuse - Time to train Personnel G. Time for Audits N/A	C. Create Information	See 3B					
- Initial design capacity report - Annual report of NMOC flow rate (Tier 1 calculation) - Report of Tier 2 and 3 Sampling - Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b 0.5 12 6 173 260 14,653.97 - Records of accumulated refuse F. Time to train Personnel G. Time for Audits N/A	D. Gather Existing Information	See 3E					
- Annual report of NMOC flow rate N/A (Tier 1 calculation) N/A - Report of Tier 2 and 3 Sampling N/A - Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b 0.5 12 6 173 260 14,653.97 - Records of accumulated refuse 8 1 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	E. Write Report						
(Tier 1 calculation) N/A - Report of Tier 2 and 3 Sampling N/A - Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring D - Records of accumulated refuse 8 1 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Initial design capacity report	N/A					
- Report of Tier 2 and 3 Sampling - Report of initial performance test - See 3B - Semi-annual compliance report - See 3B -	- Annual report of NMOC flow rate	N/A					
- Report of initial performance test See 3B - Semi-annual compliance report See 3B 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of accumulated refuse F. Time to train Personnel G. Time for Audits N/A N/A N/A N/A N/A N/A	(Tier 1 calculation)	N/A					
- Semi-annual compliance report 4. Recordkeeping Requirements A. Read Instructions See 3A B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Report of Tier 2 and 3 Sampling	N/A					
4. Recordkeeping Requirements A. Read Instructions B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Report of initial performance test	See 3B					
A. Read Instructions B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	- Semi-annual compliance report	See 3B					
B. Plan Activities N/A C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	4. Recordkeeping Requirements						
C. Implement Activities N/A D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	A. Read Instructions	See 3A					
D. Develop Record System N/A E. Time to Enter Information - Records of control system monitoring b - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	B. Plan Activities	N/A					
E. Time to Enter Information - Records of control system monitoring b - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	C. Implement Activities	N/A					
- Records of control system monitoring b 0.5 12 6 173 260 14,653.97 - Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	D. Develop Record System	N/A					
- Records of accumulated refuse 8 1 8 173 1,384 78,154.48 F. Time to train Personnel G. Time for Audits N/A	E. Time to Enter Information						
F. Time to train Personnel G. Time for Audits N/A	- Records of control system monitoring b	0.5	12	6	173	260	14,653.97
G. Time for Audits N/A	- Records of accumulated refuse	8	1	8	173	1,384	78,154.48
	F. Time to train Personnel						
Total RIPDEN AND COST 11 679 650 429	G. Time for Audits	N/A					
	Total DIDDEN AND COST					11 670	659 429

^a It's estimated that 85% of the respondent burden hours is technical; 5% management; 10% clerical. The average cost is \$56.47. Costs are based on 1989 CAIR labor rates adjusted using the latest Employment Cost Index which yields the following March 1998 hourly rates: technical at \$57.12, management at \$85.81 and clerical at \$36.27.

b Monitoring hours include operating and maintenance time.

 $^{^{\}rm c}\,\textsc{Operating}$ and maintenance costs for the year is estimated at \$1400/monitor.

Table 2. Annual Burden and Cost for the Federal Government

Activity	EPA hours per occurrence (A)	Occurences per Respondent (B)	Person-hours per Respondent (C)=(AxB)	Respondents	Total person-hours (E)=(CxD)	Cost \$ Yr
Review initial design capacity report	N/A					
Review report of initial performance test.	N/A					
Review Design Plan	N/A					
Observe initial performance tests	N/A					
Review annual NMOC emission rate report	2	1	2	173	346	12,874.66
Review Tier 2 Calculations	N/A					
Review Tier 3 Calculations	N/A					
Review annual compliance report	2	1	2	173	346	12,874.66
Travel expenses for tests attended	N/A					
					692	25,749.32

^a It's estimated that 85% of the respondent burden hours is technica; 5% management; 10% clerical. Using The average cose is \$56.47. Costs are based on 1989 CAIR labor rates adjusted using the latest Employment Cost Index which yields the following March 1998 hourly rates: technical at \$38.30, management at \$51.62 and clerical at \$20.72